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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Luanne Austin, individually, on behalf of  
herself and all others similarly situated,  
  
Plaintiff  
  
vs.  
  
Allied Collection Services, Inc.; Teachers  
Health Trust dba THT Health; and  
Digestive Disease Center dba Digestive  
Disease Specialists,  
  
Defendants

Case No.: 2:21-cv-01593-RFB-NJK

**Stipulation and Order to Extend Time to  
File Replies in Support of Motions to Strike  
[ECF No. 21], and to Dismiss [ECF Nos. 22,  
24]**

**(First Request)**

Plaintiff Luanne Austin, individually, on behalf of herself and all others similarly situated and defendants Teachers Health Trust d/b/a THT Health and Digestive Disease Center (DDS) (the “parties”) through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend THT Health’s deadline to file its reply in support of its motion to strike [ECF No. 21] and motion to dismiss [ECF No. 22], and DDS’s deadline to file its reply in support of its motion to dismiss [ECF No. 24] to February 8, 2022, for the following reasons:

1. On December 13, 2021, THT Health filed its motion to strike Austin’s class allegations and its motion to dismiss her claim under Nevada’s Deceptive Trade Practices Act.

1 DDS also filed its motion to dismiss Austin’s complaint on December 13, 2021 (collectively, the  
2 “Motions”).

3 2. On December 21, 2021, this Court granted the parties’ stipulation to extend  
4 Austin’s deadline to respond to the Motions to January 17, 2022. ECF Nos. 32, 33, 34.

5 3. Austin filed her response to the Motions on January 18, 2022.

6 4. The defendants’ replies in support of the Motions are due January 25, 2022.

7 5. The defendants require additional time to prepare their replies to the Motions  
8 because the Motions and Austin’s response concern several different aspects of Austin’s  
9 complaint and address both the merits of her individual claims and her class allegations.

10 6. The parties agreed to the extension requested.

11 7. This is the first stipulation for extension of time to file the replies.

12 8. This extension request is sought in good faith and is not made for the purpose of  
13 delay.

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Therefore, the parties respectfully request an extension for the defendants to file their replies in support of the Motions up to and including February 8, 2022.

DATED: January 21, 2021.

DATED: January 20, 2021.

FREEDOM LAW FIRM

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*Attorneys for Plaintiff*

*Attorneys for Defendant THT Health*

DATED: January 20, 2021.

DATED: January 20, 2021.

KIND LAW

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*Attorney for Plaintiff*

*Attorneys for Defendant Digestive Disease Center*

**ORDER**

Good cause appearing, **IT IS HEREBY ORDERED** that the defendants shall file their replies in support of the Motions on or before February 8, 2022.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 21st day of January, 2022.

**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2022, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLIES IN SUPPORT OF MOTIONS TO STRIKE [ECF NO. 21], AND TO DISMISS [ECF NOS. 22, 24]** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 21st day of January 2022.

/s/ Gaylene Kim-Mistrille

An employee of Snell & Wilmer L.L.P.

4879-9256-3210.1

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